

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Paul F. Ready, SB#107469 Farmer & Ready 1254 Marsh Street PO Box 1443 San Luis Obispo, CA 93401 Telephone: 805-541-1626 Fax: 805-541-0769 Email: pfreedy@farmerandready.com	FOR COURT USE ONLY
<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Paul F. Ready, Receiver	
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA</b>	
In re:  Santa Maria Brewing Co Inc.	CASE NO.: 9:20-bk-11486-DS CHAPTER: 11  <b>NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (ACTION IN NON-BANKRUPTCY FORUM)</b>  DATE: June 8, 2021 TIME: 11:30 COURTROOM: 201
Debtor(s).	
<b>MOVANT:</b> Paul F. Ready, Receiver	

1. Hearing Location:

- ☐ 255 East Temple Street, Los Angeles, CA 90012 ☐ 411 West Fourth Street, Santa Ana, CA 92701  
☐ 21041 Burbank Boulevard, Woodland Hills, CA 91367 ☒ 1415 State Street, Santa Barbara, CA 93101  
☐ 3420 Twelfth Street, Riverside, CA 92501

2. Notice is given to the Debtor and trustee (*if any*) (Responding Parties), their attorneys (*if any*), and other interested parties that on the date and time and in the courtroom stated above, Movant will request that this court enter an order granting relief from the automatic stay as to Debtor and Debtor's bankruptcy estate on the grounds set forth in the attached Motion.
3. To file a response to the motion, you may obtain an approved court form at [www.cacb.uscourts.gov/forms](http://www.cacb.uscourts.gov/forms) for use in preparing your response (optional LBR form F 4001-1.RFS.RESPONSE), or you may prepare your response using the format required by LBR 9004-1 and the Court Manual.
4. When serving a response to the motion, serve a copy of it upon the Movant's attorney (or upon Movant, if the motion was filed by an unrepresented individual) at the address set forth above.

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

5. If you fail to timely file and serve a written response to the motion, or fail to appear at the hearing, the court may deem such failure as consent to granting of the motion.
6. ☒ This Motion is being heard on REGULAR NOTICE pursuant to LBR 9013-1(d). If you wish to oppose this motion, you must file and serve a written response to this motion no later than 14 days before the hearing and appear at the hearing.
7. ☐ This Motion is being heard on SHORTENED NOTICE pursuant to LBR 9075-1(b). If you wish to oppose this motion, you must file and serve a response no later than (date) \_\_\_\_\_ and (time) \_\_\_\_\_; and you, may appear at the hearing.
- a. ☐ An Application for Order Setting Hearing on Shortened Notice was not required (according to the calendaring procedures of the assigned judge).
- b. ☐ An Application for Order Setting Hearing on Shortened Notice was filed per LBR 9075-1(b) and was granted by the court.
- c. ☐ An Application for Order Setting Hearing on Shortened Notice has been filed and remains pending. Once the court has ruled on that motion, you will be served with another notice or an order that will specify the date, time and place of the hearing on the attached motion and the deadline for filing and serving a written opposition to the motion.

Date: May 3, 2021

Farmer & Ready

Printed name of law firm (if applicable)

Paul F. Ready

Printed name of individual Movant or attorney for Movant

Signature of individual Movant or attorney for Movant

## MOTION FOR RELIEF FROM THE AUTOMATIC STAY AS TO NONBANKRUPTCY ACTION

1. In the Non-bankruptcy Action, Movant is:

- a. ☐ Plaintiff
- b. ☐ Defendant
- c. ☒ Other (specify): Receiver

2. The Nonbankruptcy Action: There is a pending lawsuit or administrative proceeding (Nonbankruptcy Action) involving the Debtor or the Debtor's bankruptcy estate:

- a. Name of Nonbankruptcy Action: *Jeff Campbell, et al., vs. Byron Moles, et al.*
- b. Docket Number: *20CVP-0282*
- c. Nonbankruptcy forum where Nonbankruptcy Action is pending: *Superior Court for the State of California, County of San Luis Obispo*
- d. Causes of action or claims for relief (Claims): *Movant is seeking the approval of the Receiver's Final Account and Report, and payment of the Receiver's remaining fees and costs from the non-debtor parties to the Nonbankruptcy Action.*

3. Bankruptcy Case History:

- a. ☒ A voluntary ☐ An involuntary petition under chapter ☐ 7 ☒ 11 ☐ 12 ☐ 13 was filed on (date) 12/15/20.
- b. ☐ An order to convert this case to chapter ☐ 7 ☐ 11 ☐ 12 ☐ 13 was entered on (date) \_\_\_\_\_.
- c. ☐ Plan was confirmed on (date) \_\_\_\_\_.

4. Grounds for Relief from Stay: Pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant Movant relief from stay to proceed with the Nonbankruptcy Action to final judgment in the nonbankruptcy forum for the following reasons:

- a. ☐ Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate.
- b. ☐ Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. ☐ Mandatory abstention applies under 28 U.S.C. § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- d. ☐ The claims are non-dischargeable in nature and can be most expeditiously resolved in the non-bankruptcy forum.
- e. ☐ The claims arise under non-bankruptcy law and can be most expeditiously resolved in the non-bankruptcy forum.
- f. ☐ The bankruptcy case was filed in bad faith
- (1) ☐ Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents
- (2) ☐ The timing of the filing of the bankruptcy petition indicates that it was intended to delay or interfere with the Nonbankruptcy Action.
- (3) ☐ Multiple bankruptcy cases affect the Nonbankruptcy Action.
- (4) ☐ The Debtor filed only a few case commencement documents. No schedules or statement of financial affairs (or chapter 13 plan, if appropriate) has been filed.
- g. ☒ Other (specify): *Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect as to the Debtor or bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 in this bankruptcy case.*

5. **Grounds for Annulment of Stay.** Movant took postpetition actions against the Debtor.

- a. ☐ The actions were taken before Movant knew that the bankruptcy case had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.
- b. ☐ Although Movant knew the bankruptcy case was filed. Movant previously obtained relief from stay to proceed in the Nonbankruptcy Action in prior bankruptcy cases affecting the Nonbankruptcy Action as set forth in Exhibit. \_\_\_\_\_.
- c. ☐ Other (specify):

6. **Evidence in Support of Motion:** (*Important Note: declaration(s) in support of the Motion MUST be signed under penalty of perjury and attached to this motion.*)

- a. ☒ The DECLARATION RE ACTION IN NONBANKRUPTCY FORUM on page 6.
- b. ☐ Supplemental declaration(s).
- c. ☐ The statements made by Debtor under penalty of perjury concerning Movant's claims as set forth in Debtor's case commencement documents. Authenticated copies of the relevant portions of the Debtor's case commencement documents are attached as Exhibit. \_\_\_\_\_.
- d. ☐ Other evidence (specify):

7. ☐ An optional Memorandum of Points and Authorities is attached to this Motion.

**Movant requests the following relief:**

- 1. Relief from the stay pursuant to 11 U.S.C. § 362(d)(1).
- 2. ☒ Movant may proceed under applicable nonbankruptcy law to have the Receiver's Final Report and Account approved by the state court and further have the Receiver's fees approved and ordered to be paid by non-debtor parties to the underlying state court litigation, enforce its remedies to proceed to final judgement in the nonbankruptcy forum, provided that the stay remains in effect with respect to enforcement of any judgment against the Debtor or property of the Debtor's bankruptcy estate.
- 3. ☐ The stay is annulled retroactively to the bankruptcy petition date. Any postpetition acts taken by Movant in the Nonbankruptcy Action shall not constitute a violation of the stay.
- 4. ☐ The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified, or annulled as to the co-debtor, on the same terms and condition as to the Debtor.
- 5. ☒ The 14-day stay prescribed by FRBP 4001(a)(3) is waived.
- 6. ☐ The order is binding and effective in any bankruptcy case commenced by or against the Debtor for a period of 180 days, so that no further automatic stay shall arise in that case as to the Nonbankruptcy Action.
- 7. ☐ The order is binding and effective in any future bankruptcy case, no matter who the debtor may be, without further notice.
- 8. ☒ Other relief requested. Movant may proceed under applicable nonbankruptcy law to enforce its remedies to proceed against third parties in the nonbankruptcy forum, provided that the stay remains in effect with respect to the Debtor or property of the Debtor's bankruptcy estate.

Date: May 3, 2021

Farmer & Ready  
Printed name of law firm (if applicable)

Paul F. Ready  
Printed name of individual Movant or attorney for Movant

Signature of individual Movant or Attorney for Movant

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

**DECLARATION RE ACTION IN NON-BANKRUPTCY FORUM**

I, (name of Declarant) Paul F. Ready, declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would competently testify thereto. I am over 18 years of age. I have knowledge regarding (Nonbankruptcy Action) because:

- ☒ I am the Movant
- ☐ I am the Movant's attorney of record in the Nonbankruptcy Action.
- ☐ I am employed by the Movant as *(title and capacity)*:
- ☒ Other *(specify)*: I am the duly appointed Receiver in the Matter of Jeff Campbell derivatively on behalf of Santa Maria Brewing Co., Inc., a California Corporation vs. Byron Moles; Karen Moles (Defendants) and Santa Maria Brewing Co. Inc., (Nominal Defendant), Case No. 20CVP-0282 now pending in the Superior Court of San Luis Obispo County (the "Non Bankruptcy Action").

2. I am one of the custodians of the books, records and files of Movant as to those books, records and files that pertain to the Non-bankruptcy Action. I have personally worked on books, records and files, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Movant on behalf of Movant, which were made at or about the time of the events recorded, and which are maintained in the ordinary course of Movant's business at or near the time of the acts, conditions or events to which they relate. Any such document was prepared in the ordinary course of business of Movant by a person who had personal knowledge of the event being recorded and had or has a business duty to record accurately such event. The business records are available for inspection and copies can be submitted to the Court if required.

3. In the Nonbankruptcy Action, Movant is:

- ☐ Plaintiff
- ☐ Defendant
- ☒ Other *(specify)*: Receiver

4. Nonbankruptcy court or agency where Nonbankruptcy Action is pending:

- a. Name of Nonbankruptcy Action: *Jeff Campbell, et al., vs. Byron Moles, et al.*
- b. Docket number: *20CVP-0282*
- c. Nonbankruptcy court or agency where Nonbankruptcy Action is pending: *Superior Court for the State of California, County of San Luis Obispo*

5. Procedural Status of Nonbankruptcy Action:

- a. The Claims are: Movant is seeking approval of the Receiver's Final Account and Report, and payment of the Receiver's remaining fees and costs from the non-debtor parties to the Nonbankruptcy Action.
- b. True and correct copies of the documents filed in the Nonbankruptcy Action are attached as Exhibit A.
- c. The Non-bankruptcy Action was filed on (date): 8/27/20.
- d. Trial or hearing began/is scheduled to begin on (date): N/A.
- e. The trial or hearing is estimated to require N/A days *(specify)*.
- f. Other plaintiffs in the Nonbankruptcy Action are *(specify)*: *Santa Maria Brewing Co., Inc.*
- g. Other defendants in the Nonbankruptcy Action are *(specify)*: *Byron Moles, Karen Moles, Santa Maria Brewing Co., Inc.*

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

6. Grounds for relief from stay:

- a. ☒ Movant seeks recovery primarily from third parties and agrees that the stay will remain in effect against the Debtor or the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C § 501 in this bankruptcy case.
- b. ☐ Mandatory abstention applies under 28 U.S.C § 1334(c)(2), and Movant agrees that the stay will remain in effect as to enforcement of any resulting judgment against the Debtor of the Debtor's bankruptcy estate, except that Movant will retain the right to file a proof of claim under 11 U.S.C. § 501 and/or an adversary complaint under 11 U.S.C. § 523 or § 727 in this bankruptcy case.
- c. ☐ Movant seeks recovery only from applicable insurance, if any, and waives any deficiency or other claim against the Debtor or property of the Debtor's bankruptcy estate. The insurance carrier and policy number are (*specify*) :
- d. ☐ The Nonbankruptcy Action can be tried more expeditiously in the nonbankruptcy forum.
- (1) ☐ It is currently set for trial on (*date*) \_\_\_\_\_.
- (2) ☐ It is in advanced stages of discovery and Movant believes that it will be set for trial by (*date*) \_\_\_\_\_. The basis for this belief is (*specify*):
- (3) ☐ The Nonbankruptcy Action involves non-debtor parties and a single trial in the nonbankruptcy forum is the most efficient use of judicial resources.
- e. ☐ The bankruptcy case was filed in bad faith specifically to delay or interfere with the prosecution of the Nonbankruptcy Action.
- (1) ☐ Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.
- (2) ☐ The timing of the filing of the bankruptcy petition indicates it was intended to delay or interfere with the Nonbankruptcy Action based upon the following facts (*specify*):
- (3) ☐ Multiple bankruptcy cases affecting the Property include:
- (A) Case name: \_\_\_\_\_ Chapter: \_\_\_\_\_ Date dismissed: \_\_\_\_\_  
Case number: \_\_\_\_\_ Date Dismissed: \_\_\_\_\_  
Date filed: \_\_\_\_\_ Date Discharged: \_\_\_\_\_  
Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted
- (B) Case name: \_\_\_\_\_ Chapter: \_\_\_\_\_ Date dismissed: \_\_\_\_\_  
Case number: \_\_\_\_\_ Date Dismissed: \_\_\_\_\_  
Date filed: \_\_\_\_\_ Date Discharged: \_\_\_\_\_  
Relief from stay regarding this Nonbankruptcy Action ☐ was ☐ was not granted
- (C) Case name: \_\_\_\_\_ Chapter: \_\_\_\_\_ Date dismissed: \_\_\_\_\_  
Case number: \_\_\_\_\_

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.



Date filed:  
Relief from stay regarding this Nonbankruptcy Action

Date Discharged:

Date Dismissed:  
☐ was ☐ was not granted

☐ See attached continuation page for information about other bankruptcy cases affecting the Nonbankruptcy Action.

☐ See attached continuation page for additional facts establishing that this case was filed in bad faith.

f. ☒ See attached for other facts justifying relief from stay.

7. ☐ Actions taken in the Nonbankruptcy Action after the bankruptcy petition was filed are specified in the attached supplemental declaration(s).

a. ☐ These actions were taken before Movant knew the bankruptcy petition had been filed, and Movant would have been entitled to relief from stay to proceed with these actions

b. ☐ Movant knew the bankruptcy case had been filed, but Movant previously obtained relief from stay to proceed with the nonbankruptcy Action enforcement actions in prior bankruptcy cases affecting the Property as set forth in Exhibit \_\_\_\_\_

c. ☐ For other facts justifying annulment, see attached continuation page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 3, 2021  
Date

Paul F. Ready  
Printed name


Signature

# **EXHIBIT A**



Paul F. Ready  
State Bar No. 107469  
**FARMER & READY**  
A Law Corporation  
1254 Marsh Street  
Post Office Box 1443  
San Luis Obispo, CA 93406  
Telephone: (805) 541-1626  
Facsimile: (805) 541-0769  
Email: pfreedy@farmerandready.com

Receiver

**ELECTRONICALLY  
FILED  
1/19/2021 2:55 PM**  
SAN LUIS OBISPO SUPERIOR COURT  
BY:   
L. D. Hurst, Deputy Clerk

SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN LUIS OBISPO  
PASO ROBLES DIVISION

JEFF CAMPBELL derivatively on behalf of SANTA MARIA BREWING CO. INC., a California Corporation,  Plaintiff,  v. BYRON MOLES; KAREN MOLES and DOES 1-30,  Defendants,  SANTA MARIA BREWING CO. INC., a California corporation,  Nominal Defendant,  MICHAEL McCORMICK,  Intervenor.	) Case No. 20CVP-0282 ) Assigned to: Hon. Linda D. Hurst ) <b>RECEIVER'S FINAL ACCOUNT AND REPORT</b> ) Hearing Date: February 23, 2021 ) Time: 9:00 a.m. ) Dept: P2 (Via Zoom)
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TO ALL PARTIES HEREIN AND THEIR ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that Paul F. Ready, Receiver, has filed his Final Account and Report of the administration of his receivership with the Clerk of the above-entitled Court and that February 23, 2021 at 9:00 a.m. has been set as the time for hearing the Final Account and Report. The hearing will be held via Zoom, at which time and place the Receiver will move

1 the Court for an order settling and approving the Final Account and Report and discharging the  
2 Receiver from any further duties or liabilities herein.

3  
4 Date: January 15, 2021

FARMER & READY

5  
6  
7 By: 

Paul F. Ready, Esq.  
Receiver

8  
9 **FINAL ACCOUNT AND REPORT**

10  
11 PAUL F. READY, the duly appointed, qualified, and acting Receiver herein, renders  
12 his Final Account and Report of his administration as follows:

13  
14 **ACCOUNT**

15 The Receiver holds no accounts or assets of the Santa Maria Brewing Co. Inc.

16  
17 **REPORT OF ADMINISTRATION**

18 1. I, Paul F. Ready, was appointed Receiver herein by order of this Court dated  
19 October 6, 2020, following an initial hearing before the Court on September 10, 2020 based  
20 upon the Plaintiff's ex parte application for the same. I thereafter participated in a  
21 teleconference on September 15, 2020 between the parties in conjunction with the parties'  
22 efforts to reach a stipulation as to the scope of the proposed receivership as to Santa Maria  
23 Brewing Company ("SMB"). Following a second hearing on September 30, 2020, I was  
24 appointed to serve as receiver to take control over the business and business assets of SMB by  
25 order of this Court entered on October 6, 2020 (the "Order").

26 2. I qualified to act as Receiver by executing the oath required by law and filing  
27 said oath with this Court on October 19, 2020. In accordance with the Order, I posted a  
28 \$10,000.00 bond with the Court on November 9, 2020.

1           3.       Based upon the Order, the parties were ordered to provide me with numerous  
2 financial and corporate records and other related documents regarding SMB's finances, bank  
3 accounts, insurance, tax obligations and general operations. In compliance with the Order I was  
4 provided in excess of 3,600 pages of such documentation for my review before the end of  
5 October 2020.

6           4.       Shortly after my appointment I was contacted by Paul Parker, the attorney for  
7 Fair Sky Enterprises (one of SMB's landlords), regarding SMB's two leaseholds located in  
8 Paso Robles, California. One of the properties had apparently been utilized by SMB for a  
9 restaurant/pub, and the second adjacent leasehold had also been leased by SMB, and the  
10 interior had been partially demolished by SMB for purposes of installing and updating tenant  
11 improvements. That work had apparently ceased several months prior and each of the  
12 respective leases were significantly in default. Under the specific terms of the Order I had been  
13 expressly authorized to negotiate with Fair Sky Enterprises regarding SMB's leasehold rights  
14 and obligations under the leases. According to Mr. Parker, SMB was then in default for unpaid  
15 rents in the amount of \$62,605.46 for such leaseholds, and that said rents continued to accrue  
16 in the amount of \$10,380.73 per month for the remaining lease terms. Mr. Parker informed me  
17 that unit which had been partially demolished would require significant repairs, and the other  
18 unit which had been formerly operated as a restaurant/pub had been abandoned and partially  
19 stripped by SMB of many of the operation's fixtures, furniture and equipment.

20           5.       On October 19, 2020, I was served with an ex parte application seeking to  
21 vacate my appointment as Receiver, which was heard, and not then granted by the Court on the  
22 morning of October 20, 2020 at 8:30 a.m. The Court ordered the matter to be set over to  
23 December 15, 2020, and additionally specifically ordered me to continue to act in a manner  
24 consistent with the Order.

25           6.       In compliance with the Order, on October 20, 2020 I inspected the three known  
26 business locations of SMB, to wit: (a) The two suites located at 1401 Park Street in Paso  
27 Robles, California under two separate leases between SMB and Fair Sky Enterprises ("Fair  
28 Sky"); (b) The restaurant/pub/brewery located at 7935 San Luis Avenue in Atascadero,

1 California, including two adjacent warehouses under a total of three separate leases; and, (c)  
2 The restaurant/pub located at 115 Cuyama Lane in Nipomo, California.

3 7. Based upon the inspections, I contacted Fair Sky's legal counsel and discussed  
4 arranging for the surrender of the Paso Robles leaseholds, and a settlement of Fair Sky's lease  
5 claims against SMB. I directed Defendant Byron Moles, through Michael Ring his legal  
6 counsel, to remove all corporate assets remaining at the Paso Robles leaseholds, and I was  
7 advised by Mr. Ring, that such had been accomplished on October 30, 2020. Thereafter the I  
8 participated in the negotiation of a settlement between Fair Sky, Santa Maria Brewing and Jeff  
9 Campbell (who had personally guaranteed performance under both Paso Robles leaseholds.  
10 Under the settlement agreement, Jeff Campbell paid the Fair Sky the sum of \$200,000.00 and I  
11 surrendered possession of the Premises to Fair Sky as landlord in full satisfaction of Fair Sky's  
12 claims against SMB under both leases.

13 8. In addition to the documentation provided me by the parties prior to October's  
14 month end, on Monday November 2, 2020, I obtained access to SMB's QuickBook files.  
15 Following my review of these documents and files, I researched and reviewed public records  
16 regarding SMB, including UCC filings, judgment and tax liens, and other matters of import.  
17 Based upon this review, and the immediate concerns which were then raised, on November 4,  
18 2020 I brought an emergency ex parte application for further instructions before this Court,  
19 brought in large part on my concerning discovery that SMB was then obligated for significant  
20 unpaid payroll taxes which had accrued during the tax years 2014 through 2018, in the amount  
21 of \$1,380,672.54, as well as other serious financial matters including: SMB's failure to  
22 maintain any liability and workers' compensation insurance; a number of significant judgments  
23 and debts which were not reflected in SMB's financial records; multiple "investor agreements"  
24 which appeared to be in default and beyond SMB's ability to satisfy; and, what appeared to me  
25 to be, at best, highly unusual banking practices. Based upon these matters I sought, and  
26 obtained a modification of the Order, relieving me of responsibilities for, and control of SMB's  
27 bank accounts. I was further relieved of the directive under the Order to provide the initial  
28 accounting to the Court. The Court set further hearing for consideration of the matters raised in

1 my application for November 16, 2020.

2 9. On November 12, 2020 I filed a supplement to my application for further  
3 instructions, in order to provide the Court and the parties with the specific results of my review  
4 of the California Secretary of State's UCC filing records, which reflected 16 UCC financial  
5 statements encumbering assets of SMB held by a variety of lenders and vendors which were  
6 then of record.

7 10. At the November 16, 2020 hearing the Court considered the various additional  
8 pleading filed by the parties regarding my application for further instructions, and set the matter  
9 over until December 16, 2020 for an evidentiary hearing. Following the November 16<sup>th</sup>  
10 hearing I made contact with the IRS, as upon further review, it appeared to me that additional  
11 payroll taxes for the tax years 2019 and 2020 also remained unpaid.

12 11. Based upon my discussions with the IRS and additional information which they  
13 provided to me; my prior review of SMB's financial records and my monitoring and review of  
14 the Debtor's bank accounts, on December 9, 2020, I filed my Receiver' Report for the Court's  
15 consideration at the December 16, 2020 hearing. While that report addressed and updated many  
16 of the matters which were included in my prior application for additional instructions, I also  
17 reported to the Court, that as of December 4, 2020, both SMB's general and payroll accounts  
18 had negative balances, and that the most recent account activity reflected over \$2,200.00 in  
19 return check and overdraft charges incurred between November and December 4, 2020.

20 12. On the afternoon of December 15, 2020, I was advised that SMB had filed for  
21 Chapter 11 relief in the U.S. Bankruptcy Court for the Northern Division of the Central District  
22 of California.

23 13. On December 17, 2020, I was contacted by SMB's bankruptcy counsel, Leslie  
24 Cohen, and requested to turn over all property of SMB which was then in my possession in  
25 accordance with the provisions of *11 U.S.C. § 543*. I offered to provide Ms. Cohen with both  
26 the premises keys which had been provided me by Mr. Moles, as well as the most recent  
27 information as been provided me by the IRS, which reflected approximately \$734,000.00 in  
28 unpaid payroll taxes for the 2019 tax year. Ms. Cohen requested only the documentation

1 associated with SMB's payroll tax obligation.

2 14. My powers as a Receiver in this matter have been effectively terminated under  
3 the provisions of *11 U.S.C. § 543* as a result of SMB's Chapter 11 filing.

4 15. As herein indicated, as Receiver I actively participated in the operations and  
5 control of SMB and have performed all orders of this Court. A true and correct copy of the  
6 itemized statement of the Receiver's professional fees and costs is attached hereto as Exhibit  
7 "A" and incorporated herein by this reference.

8 16. Receiver requests that the Court issue an Order approving the Receiver's total  
9 fees and costs in the amount of \$28,086.10, and order the payment of the unpaid balance of  
10 said fees and costs in the amount of \$13,385.00.

11 **WHEREFORE**, Receiver prays as follows:

12 1. After due notice is given and proceedings had, this Court make its order  
13 settling and approving this First and Final Account and Report;

14 2. That Receiver's total fees and costs in the amount of \$28,086.10 be approved,  
15 and that the Court order the remaining balance of \$13,385.00 be paid forthwith; and,

16 4. That the Receiver be discharged.

17 Dated: January 15 2021

FARMER & READY

18  
19 By: \_\_\_\_\_

20 Paul F. Ready, Esq.  
21 Receiver  
22  
23  
24  
25  
26  
27  
28

# EXHIBIT A



FARMER & READY  
A LAW CORPORATION

1254 MARSH STREET  
P.O. BOX 1443  
SAN LUIS OBISPO, CALIFORNIA 93406  
Telephone (805) 541-1626  
FAX Number (805) 541-0769

Superior Court  
County Government Center  
San Luis Obispo CA 93408

Page: 1  
01/14/2021  
Account No: 126-721R  
Statement No: 46599

Santa Maria Brewing vs. Byron Moles

Interim Statement

02-RCR

	HOURS	
09/10/2020		
PFR Court appearance	0.40	158.00
PFR Review and reply to email re status	0.20	79.00
09/15/2020		
PFR Teleconference re Receiver	0.70	276.50
09/16/2020		
PFR Review Stipulation; email to opposing party	0.40	158.00
09/23/2020		
PFR Review report and attachment; email to Chris Dominguez	0.40	158.00
PFR Review emails re report	0.20	79.00
09/30/2020		
PFR Review file; court appearance re Receiver's Application	1.10	434.50
PFR Telephone call(s) from Michael Ring	0.30	118.50
10/01/2020		
PFR Telephone call(s) from Morris & Garritano re bonding	0.30	118.50
PFR Review Proposed Order; telephone call to Attorney Dominguez	0.40	158.00

Superior Court

Page: 2

01/14/2021

Account No: 126-721R

Statement No: 46599

Santa Maria Brewing vs. Byron Moles  
02-RCR

		HOURS	
10/02/2020			
PFR	Complete and forward Bond Application to Morris & Garritano	0.30	118.50
PFR	Review email and final redline Order; email to C. Dominguez	0.20	79.00
10/07/2020			
PFR	Review email; review Order; email to Morris & Garritano re Bond; email to office manager re payment arrangement	0.40	158.00
10/13/2020			
PFR	Telephone call(s) from Attorney Paul Parker re Santa Maria Brewing Paso issues	0.40	158.00
10/15/2020			
PFR	Review Leases and correspondence re Paso locations	1.10	434.50
PFR	Review and reply to emails from M. Ring	0.30	118.50
10/16/2020			
PFR	Review emails; attempt Google Doc access; email to Ring	0.40	158.00
10/19/2020			
PFR	Telephone call(s) from attorney re Ex Parte Motion to Set Aside	0.20	79.00
PFR	Telephone call(s) from Attorney Ring re security codes	0.30	118.50
PFR	Review Motion to Set Aside Order and supporting documents	0.70	276.50
10/20/2020			
PFR	Review Bond, execute and file	0.40	158.00
PFR	Site visits: Paso, Atascadero, and Santa Maria	3.50	1,382.50
PFR	Review Leases, Investor Agreements, notes, and miscellaneous documents	2.70	1,066.50

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Account No: 126-721R

Statement No: 46599

Santa Maria Brewing vs. Byron Moles  
02-RCR

HOURS

10/21/2020

PFR	Review documents; draft letter to Attorney Ring re missing documents	1.30	513.50
PFR	Review bank records; draft letter to Ring re various business deposits, Captains Club, and Royal 19 Council	1.10	434.50

10/22/2020

PFR	Telephone call(s) to Attorney Parker re Paso lease	0.40	158.00
PFR	Review email from Attorney Ring	0.30	118.50
PFR	Telephone call(s) to Attorney Goldner re Paso lease and guarantys	0.30	118.50
PFR	Review Order re intervention and receivership	0.30	118.50
PFR	Review email from Karen Moles and attachments; reply to Karen Moles and all counsel	0.40	158.00

10/23/2020

PFR	Email to Karen Moles	0.20	79.00
PFR	Research re pending actions; telephone call to Attorneys M. Juarez, Brandon, and Mika	0.60	237.00
PFR	Review email from Attorney Parker and proposal re Paso and leaseholds; email Attorneys Ring and Dominguez	0.80	316.00
PFR	Review and reply to email from Karen Moles re cash and C.O.D.s	0.20	79.00

10/27/2020

PFR	Review correspondence re Paso Lease; telephone call to Chris Dominguez	0.40	158.00
PFR	Email to attorneys	0.30	118.50
PFR	Review miscellaneous documents re: Paso Leases	0.70	276.50

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01/14/2021

Account No: 126-721R

Statement No: 46599

Santa Maria Brewing vs. Byron Moles  
02-RCR

	HOURS	
10/28/2020		
PFR Review correspondence re Paso; meeting re clean up	0.70	276.50
PFR Teleconference with attorney re landlord clean up	0.40	158.00
PFR Telephone call(s) from M. Ring re Paso Robles	0.20	79.00
PFR Telephone call(s) from Attorney Parker; telephone call from C. Hamilton	0.50	197.50
PFR Telephone call(s) to Attorney Hamilton; telephone call to Attorney Parker	0.40	158.00
PFR Review Lease	0.30	118.50
PFR Emails to Ring re personal property removal	0.30	118.50
10/29/2020		
PFR Email to Attorney Curcio re tax issues	0.30	118.50
PFR Review and reply to landlord emails and demands	0.40	158.00
10/30/2020		
PFR Review correspondence from Branch and Parker	0.40	158.00
PFR Review emails; email to Hamilton re cleanup	0.20	79.00
PFR Telephone call(s) from Double Eagle re repairs	0.30	118.50
10/31/2020		
PFR Review and organize all other documents produced by parties	3.50	1,382.50
PFR Review insurance and tax documents; email to Michael Ring	0.40	158.00
11/01/2020		
PFR Review and reply to emails re Santa Maria Brewing	0.30	118.50

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01/14/2021

Account No: 126-721R

Statement No: 46599

Santa Maria Brewing vs. Byron Moles  
02-RCR

		HOURS	
11/02/2020			
PFR	Review files; email to Attorney Ring; telephone call from Attorney Ring; review merchant agreement transactions; review QuickBooks files	4.30	1,698.50
PFR	Review Investor Agreements; draft Ex Parte Request for Further Instructions	2.50	987.50
11/03/2020			
PFR	Review Secretary of State site; review all UCC filings and tax liens	2.60	1,027.00
PFR	Review and revise Ex Parte Application for Further Instructions; teleconference with Paul Parker and Hamilton re Paso locations	4.10	1,619.50
PFR	Telephone call(s) to Attorney Parker	0.30	118.50
11/04/2020			
PFR	Review and revise Ex Parte Application; review email from court clerk; telephone call from Chris Hamilton re Paso Settlement; telephone call to Michael Ring re notice	1.30	513.50
PFR	Review and revise Settlement with Fairsky landlord; email to Attorney Hamilton and Parker	0.40	158.00
PFR	Review emails re settlement	0.30	118.50
PFR	Review file re Ex Parte hearing	0.40	158.00
11/05/2020			
PFR	Review file; court appearance re emergency Motion	0.50	197.50
PFR	Telephone call(s) from Attorney Dominguez	0.40	158.00
PFR	Telephone call(s) from Attorney Ring	0.30	118.50
PFR	Review file and documents; email to defendant re policy binder; draft Order on Ex Parte Application	0.80	316.00

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01/14/2021

Account No: 126-721R

Statement No: 46599

Santa Maria Brewing vs. Byron Moles  
02-RCR

	HOURS	
11/09/2020		
PFR Review Notice of Ruling	0.20	79.00
11/12/2020		
PFR Review and execute supplemental filing	0.30	118.50
11/13/2020		
PFR Telephone call(s) from Attorney Dominguez	0.30	118.50
PFR Review all filings and attachments re request for additional instructions	1.10	434.50
11/16/2020		
PFR Telephone call(s) from Chris Dominguez	0.40	158.00
PFR Review current Bank of Sierra statements	0.30	118.50
PFR Review Ring Declaration; telephone call to IRS agent re penalty and fees	0.30	118.50
PFR Review file; court appearance re Receiver's Motion	0.70	276.50
PFR Review email from Attorney Francis; review Complaint in intervention	0.30	118.50
11/17/2020		
PFR Review email and financial documents	0.40	158.00
PFR Telephone call(s) from Marcia at IRS re payroll tax	0.30	118.50
11/18/2020		
PFR Telephone call(s) from Marcia at IRS; review fax re total taxes	0.40	158.00
PFR Review documents; email to counsel	0.20	79.00
11/24/2020		
PFR Review Withdrawal of Motion to Vacate	0.20	79.00
PFR Telephone call(s) from Chris Dominguez re status	0.30	118.50
PFR Telephone call(s) from investor Siegrist re stockholder agreement	0.30	118.50
PFR Review IRS filing and transcript	1.40	553.00

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Account No: 126-721R  
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Santa Maria Brewing vs. Byron Moles  
02-RCR

		HOURS	
12/05/2020			
PFR	Review bank records; draft report	0.70	276.50
12/07/2020			
PFR	Review and revise Receiver's Report	1.10	434.50
12/08/2020			
PFR	Review Santa Maria Brewing QuickBooks records, balance sheet, profit and loss, and various reports	1.10	434.50
PFR	Review and revise Receiver's Report	1.00	395.00
12/09/2020			
PFR	Review and revise Final Report and assemble Exhibits	0.90	355.50
12/15/2020			
PFR	Telephone call(s) from Attorney Dominguez	0.40	158.00
PFR	Telephone call(s) from Chris Dominguez; review bankruptcy filing	0.40	158.00
12/16/2020			
PFR	Telephone call(s) from D. Siegrist re status of bankruptcy	0.30	118.50
PFR	Review docket and bankruptcy filings; email to all parties and court re status	0.40	158.00
PFR	Court appearance re Status Conference	0.40	158.00
PFR	Telephone call(s) from Attorney Dominguez	0.30	118.50
12/17/2020			
PFR	Telephone call(s) from Leslie Cohen re demand for turnover; review correspondence; email to Cohen re turnover	0.60	237.00



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01/14/2021

Account No: 126-721R  
Statement No: 46599

Santa Maria Brewing vs. Byron Moles  
02-RCR

	HOURS	
12/18/2020		
PFR Email to bankruptcy counsel re tax obligations	0.30	118.50
01/12/2021		
PFR Review file; review pleading and accounting; draft Final	2.40	948.00
01/13/2021		
PFR Review and revise Final Report	0.60	237.00
PFR Appear at hearing on final account and report (projected)	0.50	197.50
PFR Prepare Order Discharging Receiver (projected)	0.30	118.50
PROFESSIONAL SERVICES RENDERED	68.50	27,057.50
10/06/2020 Court Receiver Bond		103.25
10/19/2020 Filing fee - Oath of Receiver		3.60
10/19/2020 Postage		2.40
10/19/2020 Photocopies - 42 pages		8.40
10/21/2020 Postage		1.00
10/21/2020 Photocopies - 4 pages		0.80
10/28/2020 Postage		1.95
10/28/2020 Photocopies - 18 pages		3.60
10/28/2020 Photocopies - 3606 pages		721.20
10/30/2020 Postage		0.65
10/30/2020 Postage		1.60
10/30/2020 Photocopies - 12 pages		2.40
11/04/2020 Filing fee - Exparte Application		65.25
11/05/2020 Filing fee - Proposed Order		3.60
11/05/2020 Postage		1.50
11/05/2020 Photocopies - 12 pages		2.40
11/12/2020 Filing fee - Brief		3.60
11/12/2020 Postage		8.40
11/12/2020 Photocopies - 153 pages		30.60
12/09/2020 Filing fee - Receiver's Report with Proof of		

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01/14/2021

Account No: 126-721R

Statement No: 46599

Santa Maria Brewing vs. Byron Moles  
02-RCR

Service	3.60
12/09/2020 Postage	8.80
12/09/2020 Photocopies - 152 pages	30.40
01/13/2021 Photocopies - Serve Final Account (projected)	8.80
01/13/2021 Postage - Serve Final Account (projected)	5.60
01/13/2021 Postage - Serve Order Discharging Receiver (projected)	2.00
01/13/2021 Photocopies - Serve Order Discharging Receiver (projected)	3.20
TOTAL EXPENSES	1,028.60
 TOTAL FEES AND COSTS	 28,086.10
  10/19/2020 Payment on account	  -3,000.00
10/19/2020 Payment on account	-3,000.00
12/28/2020 Payment on account	-8,701.10
TOTAL PAYMENTS	-14,701.10
 BALANCE DUE	 <u>\$13,385.00</u>

**PROOF OF SERVICE**  
**(CCP § 1013(a) and 2015.5)**

I am employed in the County of San Luis Obispo, State of California. I am over the age of 18 and not a party to the within action; my business address is 1254 Marsh Street, San Luis Obispo, California 93401.

On January 19, 2021, I served the following described documents:

**Receiver's Final Account and Report**

on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope addressed as follows:

**Attorneys for Plaintiff Jeff  
Campbell**

Barry L. Goldner, Esq.  
Christopher E. Dominguez, Esq.  
Klein, Denatale, Goldner,  
Cooper, Rosenlieb & Kimball, LLP  
4550 California Ave., Second Floor  
Bakersfield, CA 93309

**Attorneys for Defendants Byron &  
Karen Moles;**

Michael P. Ring, Esq.  
Law Office of Michael P. King &  
Assoc.  
1234 Santa Barbara Street  
Santa Barbara, CA 93101

**Attorney for Intervenor:**

James Kelly Francis  
Kirwin & Francis  
260 Maple Court, Suite 220  
Ventura, CA 93003

**Attorney for Nominal Defendant,  
Santa Maria Brewing Co. Inc.**

Nnana Awa  
The Crone Law Group P.C.  
9665 Wilshire Boulevard, Suite 895  
Beverly Hills, CA 90212


**XXX BY MAIL** - Following ordinary business practice, I placed said envelope(s) for collection and mailing at the offices of Farmer & Ready, located at 1254 Marsh Street, San Luis Obispo, California 93401. I am readily familiar with the firm's practice of collection and processing correspondence or mailing. Under that practice, it would be deposited with the U. S. Postal Service on that same day with postage thereon fully prepaid, at San Luis Obispo, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing an affidavit.

**BY FEDERAL EXPRESS** - I caused the envelope(s) to be delivered to an authorized courier or driver authorized by FEDERAL EXPRESS to receive documents with delivery fees provided for.

**BY EMAIL** - I caused this document to be transmitted via email to the email address(es) listed for the addressee(s). [ ] The document is being transmitted via email pursuant to agreement of counsel authorizing service of the document via email; or [ ] The document is being transmitted via email as a courtesy only and not pursuant to any stipulation of counsel authorizing service of the document via email.

**BY ELECTRONIC SERVICE** - Pursuant to California Rules of Court, Rules 2.250 et seq. and 2.251(a)(2)(B) and California Code of Civil Procedure section 1010.6(C)(2). [ ] The document was submitted to Odyssey eFileCA to be electronically filed with the California Superior Court for the County of San Luis Obispo and Odyssey eFileCA was instructed to electronically serve the document; or [ ] The document is being transmitted via email as a courtesy only and not pursuant to any stipulation of counsel authorizing service of the document via email.

**BY PERSONAL SERVICE** - I caused such envelope(s) to be delivered by hand to the address(es) shown on the Service List.

  
Tamara L. Wickstrom

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
1254 Marsh Street, San Luis Obispo, CA 93401.

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. §362 (with supporting declarations) (ACTION IN A NON-BANKRUPTCY FORUM)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) May 4, 2021 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Hagop T Bedoyan** hagop.bedoyan@mccormickbarstow.com, terry.douty@mccormickbarstow.com (**Attorney for Double Eagle Investments, Inc. & Jeffrey Campbell**)
- **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;olivia@lesliecohenlaw.com (**Attorney for Debtor**)
- **Jamie P Dreher** jdreher@downeybrand.com, mfrazier@downeybrand.com;courtfilings@downeybrand.com (**Attorney for Associated Winery Systems, Inc.**)
- **Lori L Enrico** lori@giannettaenrico.com, melanie@giannettaenrico.com (**Attorney for Bank of Sierra**)
- **Brian D Fittipaldi** brian.fittipaldi@usdoj.gov (**Attorney for U.S. Trustee**)
- **Alan Craig Hochheiser** ahochheiser@mauricewutscher.com, arodriguez@mauricewutscher.com (**Attorney for AmTrust North America on behalf of Security National Insurance Company**)
- **Sandra McBeth** donna@mcbethlegal.com (**Interested Party**)
- **Kenneth Miskin** Kenneth.M.Miskin@usdoj.gov (**Attorney for U.S. Trustee**)
- **United States Trustee (ND)** ustpreion16.nd.ecf@usdoj.gov (**U.S. Trustee**)
- **Larry D Webb** Webblaw@gmail.com, larry@webblaw.onmicrosoft.com (**Interested Party**)

☐ Service information continued on attached page

### **2. SERVED BY UNITED STATES MAIL:**

On (*date*) May 4, 2021 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

#### **Judge's Copy:**

Honorable Deborah J. Saltzman  
U.S. Bankruptcy Court  
Roybal Federal Building  
255 E. Temple Street, Ste., 1634  
Los Angeles, CA 90012

#### **Debtor:**

Santa Maria Brewing Co., Inc.  
7935 San Luis Ave.  
Atascadero, CA 93422

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

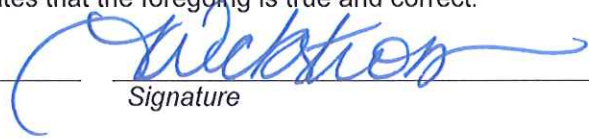
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

5/4/21

Date

Tamara L. Wickstrom

Printed Name



Signature

**SECURED CREDITORS:**

Employment Development Department  
Bankruptcy Group MIC 92E  
PO Box 826880  
Sacramento, CA 94280-0001

Landsberg Orora  
6600 Valley View St.  
Buena Park, CA 90620

Landsberg Orora Inc.  
1900 W. University Dr. Ste 101  
Tempe, AZ 85281

Alpha Capital Source Inc.  
734 W. Broadway  
Woodmere, NY 11598

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Michael & Marianne McCormick  
2053 A St.  
Santa Maria, CA 93455

Biz Fund LLC  
2371 McDonald Ave.  
Brooklyn, NY 11223

IRS  
PO Box 145595  
Cincinnati, OH 45250

Propero/Associated Wine Systems  
7787 Bell Rd.  
Windsor, CA 95492

Bizfund LLC  
2373 McDonald Ave Fl 2<sup>nd</sup>  
Brooklyn, NY 11223

IRS  
Attn Mary Garcia  
2384 Professional Pkwy  
Santa Maria, CA 93455

San Luis Obispo County Tax Collector  
1055 Monterey St. Room D-290  
San Luis Obispo, CA 93408-1003

Business Merchant Funding  
1022 Avenue M  
Brooklyn, NY 11223

Kash Capital  
475 Northern Blvd.  
Great Neck, NY 11021

Santa Barbara County Tax Collector  
PO Box 579  
Santa Barbara, CA 93102-0579

Business Merchants  
1024 Ave. M  
Brooklyn, NY 10038

Keg Logistics  
PO Box 912908  
Denver, CO 80291

Complete Business Solutions Group,  
Inc.  
22 N. 3<sup>rd</sup> Street  
Philadelphia, PA 19106

EDD  
722 Capital Mall  
Sacramento, CA 95814

Keg Logistics LLC  
9110 E. Nichols Ave., Ste 105  
Centennial, CO 80112

Yellowstone Capital  
116 Nassau St. 8<sup>th</sup> Floor  
New York, NY 10038

**COMMITTEE OF UNSECURED CREDITORS:**

Joseph Bertao  
2324 Nightshade Lane  
Santa Maria, CA 93455

Steve Knoph  
7120 Valle Avenue  
Atascadero, CA 93422

Steven Eric Mussack  
4988 Chancellor Lane  
Eugene, OR 97402

Daniel F. Sheehy  
13128 Hartsook Street  
Sherman Oaks, CA 91423

Steve Golis  
1560 Alamo Pintado  
Solvang, CA 93463

Stephen Siemsen  
945 Quail Meadows Court  
Orcutt, CA 93455

Michael McCormick  
2053 A Street  
Santa Maria, CA 93455



**20 LARGEST UNSECURED CREDITORS:**

Jeff Cambell  
4000 Country Club Dr.  
Bakersfield, CA 93306

Don Sylvester  
186 Deer Run Ln.  
Orcutt, CA 93455

Bank of the Sierra  
86 North Main Street  
Porterville, CA 93257

Corrine and Hilal Helweh  
6201 Los Gatos Rd.  
Atascadero, CA 93422

Joseph Bertao  
2324 Nightshade Ln.  
Santa Maria, CA 93455

Joseph and Heather Witts  
735 Richmind Ct.  
Santa Maria, CA 93455

Steve Mussack  
4988 Chancellow Ln  
Eugene, OR, 97402

Keith and Ruth Moles  
125 N. Halcyon  
Arroyo Grande, CA 93420

Sean Knoph  
7120 Valle Ave.  
Atascadero, CA 93422

Dionysios Pettas  
10 Villa Ct.  
San Luis Obispo, CA 93401

Clyde & Pauline Hernandez  
1108 Rosewood Dr.  
Santa Maria, CA 93458

SPG Advance  
5306 New Utrecht Ave.  
Brooklyn, NY 11219

Michael Early  
10718 W. Blackhawk Dr.  
Boise, ID 83709

Steve Golis  
205 E. Carrillo Ste. 100  
Santa Barbara, CA 93101

Santa Barbara Land Co. LLC  
420 E. Carrillo St.  
Santa Barbara, CA 93101

Stephen Siemsen  
945 Quail Meadows Ct.  
Orcutt, CA 93455

Jill Cobb  
2949 Noble Star  
Prescott, AZ 86301

John & Denise Nielsen  
7525 Santa Ynez Ave.  
Atascadero, CA 93422

Demetrios Pettas  
5000 Hawxhurst Ct.  
Antioch, CA 94531

Sean Knoph  
7120 Valle Ave.  
Atascadero, CA 93422